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14 Attorneys for Plaintiffs, CENTURY-NATIONAL INSURANCE COMPANY, PACIFIC
15 PIONEER INSURANCE GROUP, INC., PACIFIC PIONEER INSURANCE COMPANY, and
16 UCA GENERAL INSURANCE SERVICES

17 **UNITED STATES DISTRICT COURT**

18 **DISTRICT OF NEVADA**

19 CENTURY-NATIONAL INSURANCE) Case No.: 2:18-cv-02090-APG-BNW
20 COMPANY, a California corporation,)
21 PACIFIC PIONEER INSURANCE GROUP,)
22 INC., a Delaware corporation, PACIFIC)
23 PIONEER INSURANCE COMPANY, a)
24 California corporation, and UCA GENERAL)
25 INSURANCE SERVICES, a California)
26 corporation,)
27)
28 Plaintiffs,)
vs.)
DOUGLAS J. GARDNER, ESQ., an)
individual, DOUGLAS J. GARDNER, LTD.,)
a Nevada domestic professional corporation,)
RANDS & SOUTH, LTD., a Nevada domestic)
professional corporation, ALPS PROPERTY)
& CASUALTY INSURANCE COMPANY, a)
Montana corporation, DOES 1 through 20,)
inclusive)
Defendants.)

1 The Parties through their respective counsel of record hereby stipulate and agree as
2 follows:

3 This action arises from a dispute over Plaintiffs' claims of legal malpractice, breach of
4 contract, and fraud in the defense to judgment and post-judgment settlement of a multi-million
5 dollar underlying action for personal injury damages.

6 On October 12, 2021, the Court granted (ECF No. 114) the Parties' First Request for
7 Stipulation and Order to Extend Deadline to File Joint Pre-Trial Order (ECF No. 113), to
8 accommodate the Parties' attempts to resolve this action through mediation.

9 The Parties' First Request stipulated to extend the Joint Pre-Trial Order deadline to 30
10 days after completion of mediation.

11 The Parties participated in and completed an all-day mediation on January 27, 2022
12 before the Honorable Judge Jackie Glass (Ret.) of Advanced Resolution Management. The
13 Parties did *not* settle their disputes or resolve the instant litigation through mediation.

14 The Joint Pre-Trial Order deadline is therefore Saturday, February 26, 2022.

15 Wherefore, the Parties hereby stipulate and request that the deadline to file the Joint Pre-
16 Trial Order be extended 30 days from the current deadline, to Monday, March 28, 2022, to
17 facilitate the Parties' efforts in meeting and conferring on and preparing a thorough Joint Pre-
18 Trial Order that addresses the extensive number of issues and evidence to be addressed at trial.

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1 This is the second stipulation for extension of time to file the proposed Joint Pre-Trial Order.

2 IT IS SO STIPULATED.

3 Dated February 18, 2022

4 PYATT SILVESTRI

5 MARSHALL & ASSOCIATES

6 /s/ James P.C. Silvestri

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15 OLSON, CANNON, GORMLEY
ANGULO & STOBERSKI

16 /s/ Thomas D. Dillard, Jr.

17 JAMES R. OLSON, ESQ.
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18 THOMAS D. DILLARD, ESQ.
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9950 West Cheyenne Avenue
Las Vegas, Nevada 89129
19 Attorney for Defendant ALPS

20 **ORDER**

21 **IT IS SO ORDERED**

22 **DATED:** 12:46 pm, February 22, 2022

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24 **BRENDA WEKSLER**
UNITED STATES MAGISTRATE JUDGE

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2 **CERTIFICATE OF SERVICE**
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4 I HEREBY CERTIFY that on the 18th day of February 2022, I served the above
5 **STIPULATION AND ORDER TO EXTEND DEADLINE TO FILE JOINT PRE-TRIAL**
6 **ORDER** through CM/ECF system of the United States District Court for the District of Nevada
7 (or, if necessary, by U.S. Mail, first class, postage pre-paid), upon the following:
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35 Attorneys for Defendants Douglas J. Gardner, Esq.
36 Douglas J. Gardner, Ltd., and Rands & South Ltd.

37 _____
38 /s/ *Kim K. Ranck*

39 An Employee of Marshall & Associates